



SPICER HEAVY SYSTEMS ASSEMBLY DIVISION

September 27, 2000

A03-0014
(other facility
is in region 4)

The Performance Track Information Center
C/o Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140

To Whom It May Concern,

Enclosed you will find two applications for the National Environmental Achievement Track from Dana Corporation's Spicer Heavy Systems Assembly Division. We have two plants in our division and both are submitting an application.

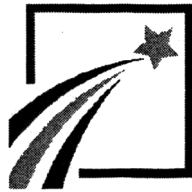
If you have any questions regarding our Environmental Management Systems, you will find the contact for each facility listed in the applications. Thank you. We look forward to hearing a response from you about our acceptance into the program.

Sincerely,

A handwritten signature in cursive script that reads "Tiffany L. Biese".

Tiffany L. Biese
Quality Administrator

People Finding A Better Way



*National
Environmental
Achievement Track*

Application Form

Spicer Heavy Systems Assembly Division, Lancaster SC

Name of facility

Dana Corporation

Name of parent company (if any)

2919 Old Tree Drive

Street address

Street address (continued)

Lancaster, PA 17603


City/State/Zip code

Give us information about your contact person for the
National Environmental Achievement Track Program.

Name Gene Schmitt

Title Safety Coordinator

Phone (717) 481- 2638



Fax (717) 481-2630

E-mail Gene.Schmitt@dana.com

Why do we need this information?

EPA needs background information on your facility to evaluate your application.

What do you need to do?

- Provide background information on your facility.
- Identify your environmental requirements.

Section A

Tell us about your facility.

1 What do you do or make at your facility? We assemble Class 8 Heavy Truck chassis

2 List the Standard Industrial Classification (SIC) code(s) or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.

SIC

3714

NAICS

3 Does your company meet the Small Business Administration definition of a small business for your sector?

☐ Yes

☒ No

4 How many employees (full-time equivalents) currently work at your facility?

☐ Fewer than 50

☐ 50-99

☒ 100-499

☐ 500-1,000

☐ More than 1,000

5 Does your facility have an EPA ID number(s)?

☒ Yes

☐ No

If yes, list in the right-hand column.

PAD130755002

6 Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right *or* enclose a completed Checklist with your application.

AIR POLLUTION REGULATIONS

1. Permits and Registration of Air Pollution Sources

HAZARDOUS WASTE MANAGEMENT REGULATIONS

1. Identification & Listing of Hazardous Waste (40 CFR 261)

– Characteristic Waste

–Listed Waste

HAZARDOUS MATERIALS MANAGEMENT

1. Designation of Reportable Quantities & Notification of Hazardous Materials Spill (40 CFR 302)

2. Hazardous Materials Transportation Regulations (49 CFR 172–173)

3. Worker Right-to-Know Regulations (40 CFR 350–372)

WATER POLLUTION CONTROL REQUIREMENTS

1. Oil Spill Prevention Control & Countermeasures (SPCC) (40 CFR 112)

2. NPDES Permit Requirements (40 CFR 122)

3. EFFLUENT LIMITATIONS FOR DIRECT DISCHARGERS

4. PERMIT MONITORING/REPORTING REQUIREMENTS

7 Check the appropriate box in the right-hand column.

☒ I've listed the requirements above.

☐ I've enclosed the Checklist with my application.

8 Optional: Is there anything else you would like to tell us about your facility?

We are ISO-14001 certified.

Why do we need this information?

Facilities must have an operating Environmental Management System (EMS) that meets certain requirements.

What do you need to do?

- Confirm that your EMS meets the Achievement Track requirements.
- Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.

Section B

Tell us about your EMS.

1 Check *yes* if your EMS meets the requirements for each element below as defined in the instructions.

a. Environmental policy ☒ Yes

b. Planning ☒ Yes

c. Implementation and operation ☒ Yes

d. Checking and corrective action ☒ Yes

e. Management review ☒ Yes

2 Have you completed at least one EMS cycle (plan-do-check-act)? ☒ Yes

3 Did this cycle include both an EMS and a compliance audit? ☒ Yes

4 Have you completed an objective self-assessment or third-party assessment of your EMS? ☒ Yes

If yes, what method of EMS assessment did you use?

☐ Self-assessment

☐ GEMI

☐ Other

☐ CEMP

☒ Third-party assessment

☒ ISO 14001 Certification

☐ Other

Why do we need this information?

Facilities must show that they are committed to improving their environmental performance. This means that you can describe past achievements and will make future commitments.

What do you need to do?

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.

Section C

Tell us about your past achievements and future commitments.

- 1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you qualify as a small facility as defined in the instructions, you are required to report past achievement for at least one environmental aspect.

First aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Land contamination	Unknown	bulbs	206	bulbs
Fluorescent light bulbs				

i. How is the current level an improvement over the previous level?

We now send spent light bulbs to a qualified recycling facility. In the past, light bulbs were disposed of in the municipal trash.

ii. How did you achieve this improvement?

Inspected a qualified recycling facility, developed an internal policy for disposition of spent light bulbs. Maintenance employees were trained & educated on the new policy and method of disposal.

Section C, continued

Second aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
	thousands/ gallons	Monthly Avg. 294	thousands/ gallons	Monthly Avg. 150
<p>i. How is the current level an improvement over the previous level? We have significantly reduced the amount of water used monthly at our facility.</p>				
<p>ii. How did you achieve this improvement? We installed a closed-loop system so that water is reused several times prior to elimination of the water. In the past water was used once and discharged to the local POTW.</p>				

- 2 Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the Instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this section.

Note to small facilities: If you are a small facility, you are required to make commitments for at least two environmental aspects in two different categories.

First aspect you've selected

a. What is the aspect?

Oil and grease runoff from Receiving parking area

b. Is this aspect identified as significant in your EMS?

X Yes No

c. What is the current level? You may choose to state

Option A:

Absolute value

last test was 5.1 mg/L
(Quantity/ Units)

Option B:

In terms of
units of production
or output

(Quantity/ Units)

Section C, continued

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A: 20% reduction
Absolute value (Quantity/Units)

☐ Option B:
In terms of units of production or output (Quantity/Units)

e. How will you achieve this improvement?

We will implement administrative and engineering controls to further reduce this quantity.

Second aspect you've selected

a. What is the aspect?

Batteries

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A: Approximately 150 batteries
Absolute value (Quantity/Units)

☐ Option B:
In terms of units of production or output (Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☐ Option A:
Absolute value (Quantity/Units)

☒ Option B:
In terms of units of production or output A 20% increase in the number batteries recycle
(Quantity/Units)

e. How will you achieve this improvement?

We will increase awareness among our employees through meetings and postings.
We will also accept batteries from home so that they are disposed of properly.

Third aspect you've selected

- a. What is the aspect? Plastic caps
- b. Is this aspect identified as significant in your EMS? ☒ Yes ☐ No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- ☐ Option A: Absolute value 10 cubic yards/week
(Quantity/Units)
- ☒ Option B: In terms of units of production or output One set of caps for every rear axle produced.
(Quantity/Units)
- d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.
- ☐ Option A: Absolute value
(Quantity/Units)
- ☒ Option B: In terms of units of production or output Capture and recycle 80% of the yoke caps.
(Quantity/Units)
- e. How will you achieve this improvement?

WE will establish a bin/container for operators to place the caps in so that they will not be co-mingled with the trash. The caps will then be transferred to our Materials Department and ultimately to the vendor for recycling.

Fourth aspect you've selected

- a. What is the aspect? Reduction of Volatile Organic Compounds
- b. Is this aspect identified as significant in your EMS? ☒ Yes ☐ No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- ☒ Option A: Absolute value 1.28 tons/year
(Quantity/Units)
- ☐ Option B: In terms of units of production or output
(Quantity/Units)
- d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.
- ☒ Option A: Absolute value 15 % reduction of VOC's
(Quantity/Units)
- ☐ Option B: In terms of units of production or output
(Quantity/Units)
- e. How will you achieve this improvement?
- By eliminating products containing VOC's
or substituting products containing
VOC's with other more environmentally
friendly products.

Why do we need this information?

Facilities must demonstrate their commitment to public outreach and performance reporting. You should have appropriate mechanisms in place to identify community concerns, to communicate with the public, and to provide information on your environmental performance.

Section D

Tell us about your public outreach and reporting.

What do you need to do?

- Describe your approach to public outreach.
- List three references who are familiar with your facility.

1 How do you identify and respond to community concerns?

Our Human Resource Manager receives, documents and responds to all communication requests from external interested parties regarding our environmental aspects and the environmental management system.

2 How do you inform community members of important matters that affect them?

We use the local newspaper to inform community members of matters that affect them.

3 How will you make the Achievement Track Annual Performance Report available to the public?

- ☐ Website www.
- ☒ Newspaper
- ☐ Open Houses
- ☐ Other

4 Are there any ongoing citizen suits against your facility? ☐ Yes ☒ No

If yes, describe briefly in the right-hand column.

5 List references below

	Organization	Name	Phone number
<i>Representative of a Community/Citizen Group</i>	Fulton Opera House	Deidre W. Simons	717-394-7133
<i>State/Local Regulator</i>	Board of Commissioners of Lancaster County	Howard Shaub	717-295-3695
<i>Other community/local reference</i>	Community Hospital of Lancaster	Maureen Gallo	717-239-4356

Section E

Application and Participation Statement

On behalf of

Dana Corporation Spicer Heavy Systems
Assembly Division, Lancaster PA
I certify that

- I have read and agree to the terms and conditions, as specified in the *National Environmental Achievement Track Program Description* and in the *Application Instructions*.
- I have personally examined and am familiar with the information contained in this Application (including, if attached, the Environmental Requirements Checklist). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;
- My facility has an environmental management system (EMS), as defined in the Achievement Track EMS requirements, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date *Kenneth D. Jackowski 11/15/00*

Printed Name/Title *KENNETH D. JACKOWSKI, DIRECTOR OF QUALITY*

Facility Name Dana Corporation Spicer Heavy Systems Assembly Division, Lancaster PA

Facility Street Address 2919 Old Tree Drive
Lancaster PA 17603

Facility ID Numbers

The National Environmental Performance Track is a U.S. Environmental Protection Agency program. Please direct inquiries to 1-888-339-PTRK or e-mail ptrack@indecon.com. Mail completed applications to:

The Performance Track Information Center
c/o Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140